UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

C.A. No. 05-11169 DAWN THOMPSON, on behalf of herself and all others similarly situated, Plaintiff. v. WYETH, INC., a/k/a WYETH COMPANY f/k/a American Home Products Corporation, WARNER-LAMBERT COMPANY. PARKE-DAVIS, a Division of Warner-Lambert Company, PFIZER, INC., MCNEIL-PPC, INC., NOVARTIS CORPORATION, NOVARTIS CONSUMER HEALTH, INC., RITE-AID CORPORATION, PRESTIGE BRAND, INC., and THE PROCTOR AND GAMBLE COMPANY, Defendants.

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to LR 83.5.3(b), the undersigned member of the bar of this Court hereby moves that John E. Hall, Michael S. Labson and Wendy M. Ertmer of the firm of Covington & Burling be allowed to appear and practice in this Court as counsel for the defendant, The Procter & Gamble Company, in the above-captioned matter.

The undersigned member of the bar of this Court, Edwin F. Landers, Jr., is a partner in the law firm of Morrison Mahoney LLP, 250 Summer Street, Boston, Massachusetts 02210-1181, (617) 439-7500, and is admitted to practice before the highest courts of Massachusetts.

The Certificates of John E. Hall, Michael S. Labson and Wendy M. Ertmer are submitted herewith in accordance with Local Rule 83.5.3(b). As set forth in these Certificates, John E. Hall, Michael S. Labson and Wendy M. Ertmer are members of the bar in good standing in every jurisdiction in which they have been admitted to practice, have no disciplinary proceedings pending against them, and are familiar with the Local Rules of this Court.

The undersigned counsel has noticed his appearance in the above-captioned matter through the attached Notice of Appearance filed herewith

Respectfully submitted,

THE PROCTER & GAMBLE COMPANY By its Attorneys,

Edwin F. Landers, Jr., BBO#559360

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MORRISON MAHONEY LLP

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Date: July 8, 2005